

Cooperative Agreement Work Plan
Chicago Park District – United States Environmental Protection Agency
DuSable Park

Catalog of Federal Domestic Assistance Number: 66.802

USEPA Executive Order: 12372

Project Applicant: Chicago Park District

a. Project Title: DuSable Park Thorium Contaminated Material Investigation and Removal

b. Total Project Funding: \$269,287.00

c. Project Start Date: March 1, 2011

d. Project End Date: January 31, 2016

e. Point of Contact(s):

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f. Programmatic Capability:

Ability to administer and report on grants

The Chicago Park District is an independent unit of local government, with an annual operating budget of over \$390 million. CPD manages over 200 public facilities and more than 7600 acres of parkland within the City of Chicago, including Chicago's 24 public swimming beaches. CPD applies for and receives numerous grants from state and federal agencies every year. Grant reporting is handled by dedicated staff in the Office of Budget and Management, with assistance from programmatic staff for narrative information as needed.

Expertise of key personnel

Daniel Cooper is the environmental engineer for the Chicago Park District. He has a bachelor's degree in Geosciences from Penn State University and is an Illinois licensed Professional Geologist with over 10 years of experience working on projects involving environmental investigation and site remediation. He has direct experience working with the US EPA on sites within Chicago's Streeterville Thorium Moratorium area, such as the DuSable Park site and Mr. Cooper also has extensive experience managing engineering consulting firms through all phases of environmental investigation and remediation.

Cathy Breitenbach is in charge of riverfront, shoreline and water quality issues for the Chicago Park District's Office of Green Initiatives. She has a Master's Degree in Environmental Planning from the University of California at Berkeley, and over 10 years of experience with water policy in the Great Lakes Region. Prior to her work at CPD, she was an Assistant to the Mayor in Mayor Richard M. Daley's office, where she worked on water and stormwater policy for the City of Chicago. She also manages several GLRI grants from the USEPA related to the Chicago Park District's beach monitoring and notification program.

g. Project Narrative Statement:

The DuSable Park site is located along Chicago's lake front which contains a park system that is among the busiest in the country, with millions of visitors every year. This project site is key to linking the park system north and south of the Chicago River. In order to move forward with park development, thorium contaminated materials (thorium source material; thorium product; thorium byproduct material/waste; and soil, sediments, debris and fill materials with thorium or thorium byproduct contamination) at the site must be remediated.

As part of this project the Chicago Park District will proceed with the removal of previously identified thorium contaminated materials at the DuSable Park site. The scope of work for this project will be to remove and dispose of the thorium contaminated materials from these hot spots and, if funding remains, further evaluate the site for any additional thorium contaminated material. The goal of the project will be to complete all remediation work necessary to move forward with development of the park space.

h. Outputs/Outcomes:

The expected outcome of this project is the removal of thorium contaminated material from six previously identified areas on the site and if funding remains, complete further site survey work to investigate for any additional thorium contaminated materials. The primary expected output is a completion report that describes all investigation and removal activities and ultimately a remediated property that can be developed into a publically accessible recreational space.

i. Site Description:

Project location

Address: 653 East North Water Street, Chicago, Cook County, Illinois 60611
Latitude and Longitude: 60611, 41.88964/-87.61324

Physical Characteristics

The DuSable Park site consists of 3.24 acres of reclaimed land where fill material was placed along the Lake Michigan shoreline. The lithology at the site consists of a mixture of fill sand, silt, clay, and topsoils to depths ranging from 10 to 12 feet below ground surface (bgs). Groundwater is located at approximately 8 to 9 feet bgs.

The site is surrounded to the south, east, and north by the waters of the Chicago River and Odgen Slip with steel sheet piling along these borders. To the west is Lake Shore Drive and an underpass to a currently vacant construction site.

Nature of Release

The fill material that was placed along the Lake Michigan shoreline to create this property likely came from a variety of sources. One of the sources is potentially the Lindsay Light and Chemical Company manufacturing facility, which operated from the early 1900s to the 1930s and was located approximately $\frac{3}{4}$ of a mile to the northwest of the DuSable Park site. This fill material may have included thorium source material, thorium product, thorium byproduct material/waste and/or thorium-contaminated debris. Thorium is a particularly persistent contaminant in the environment due to its extremely long half-life, and as such, the most effective action is removal and disposal at a facility permitted to accept radioactive waste.

j. Proposed Work:

Background

The DuSable Park site is located on an area of reclaimed land where fill material was placed along the Lake Michigan shoreline starting in the 1860's. In 2000, as part of the study of the Streeterville area, the US EPA identified the DuSable Park site as a potential location for thorium contaminated material from the former Lindsay Light and Chemical Company. USEPA

then completed a gamma radiation surface survey and detected elevated levels of thorium at several locations on the DuSable Park site.

In 2002, Kerr McGee Chemical Corporation (KM), the successor to the Lindsay Light and Chemical Company, completed further site investigation surveys at DuSable Park. The 2002 radiation surface survey, completed by KM's subcontractor, ProSource Technologies, identified the presence of five (5) locations in which radiation concentrations exceeded the USEPA's cleanup threshold of 7.1 pCi/g of total radium. These five (5) "hot-spots" were located in three different areas of the site. The hot-spots were labeled as A, B-1, B-2, B-3, and C and are shown in the attached **Figure 1.0**.

Based on the ProSource Technologies survey, KM submitted a removal workplan to USEPA to address the hot-spot areas and began to remove some materials from certain hot-spots. However, KM and USEPA disagreed on the scope of work and KM abruptly ceased removal activities in October 2002. The quantity and location of this limited material removal is unknown.

Further discussion with USEPA and KM failed to produce an agreed upon workplan and then discussions ceased as KM completed a corporate restructuring wherein it spun off a large portion of its environmental liabilities to Tronox, LLC. In 2009 Tronox filed for bankruptcy. In the mean time, the identified hot-spots were barricaded and other areas of the site were further screened for thorium contamination.

In 2007 and 2008, the Shelbourne Development Company, the developer for a construction project on the adjacent property, built an access ramp on the DuSable Park property. Additional elevated thorium concentrations were identified at three different locations during construction of the ramp. Shelbourne's environmental engineering consultant (STS Consultants) worked with the EPA to delineate the thorium contaminated material identified at each of these three locations during the ramp construction. The thorium contaminated material at two of these three areas was removed from the site. The remaining area with thorium contaminated material is located in the northwest portion of the site and is identified as "Existing Elevated Area, October 2007" in **Figure 1.0**. The removal of this hot-spot area and confirmation screening of the other two areas will be incorporated into the site-specific work plan.

At this time, STS Consultants also performed a walkover survey of the perimeter of the site adjacent to the seawall and the existing soil mounds on the property and did not identify any other thorium contaminated material.

In 2009 the USEPA also completed a radiation walk-over gamma radiation survey of the property and did not identify any surface thorium contamination above the action level of 7.1 pCi/g.

Statement of Work

The scope of work for this project includes removing the thorium contaminated materials from the previously identified hot spots and, if funding remains, the completion of further site survey work to investigate for any additional thorium contaminated material.

The Chicago Park District will contract with a qualified firm from its pre-qualified pool of environmental engineering companies which has experience working with the USEPA on radiological survey and removal projects in Chicago's Streeterville area. The Chicago Park District's environmental engineering subcontractor will complete the following tasks:

Task 1 – Document Preparation

Work Plan

Prior to any site work, the Park District's engineering contractor will submit a site-specific work plan to the USEPA for approval. No work will commence without approval from the USEPA. This site-specific work plan will include such things as equipment and materials to be used and all methods and procedures for radiological screening, hot-spot delineation, verification sampling, dust control, decontamination, soil excavation, materials management, and disposal.

The work plan will also include a description of the required signage to be posted at the site which will provide appropriate contacts for obtaining information on activities being conducted at the site and for reporting suspected criminal activities.

Additionally, separate Standard Operating Procedures (SOP) will be created and incorporated into the work plan for all required tasks including, but not limited to:

- Instrument Calibration
- Gamma Radiological Surveys
- Soil Sampling Procedures
- Excavation Procedures
- Verification Survey
- Radioactive Material Shipments
- Decontamination
- Sample Preparation Procedure for Gamma Spectral Analysis

Quality Assurance Plan

The Chicago Park District will comply with all requirements regarding quality assurance described in 40 CFR 31.45 as this project does involve environmentally related measurements and data generation. A Quality Assurance Plan (QAP) will be prepared to describe the quality assurance and quality control measures that will be implemented.

As the preparation of the QAP will be a task for the Chicago Park District's environmental engineering contractor, the Chicago Park District requests that the USEPA to allow the QAP to

be submitted separately from this application. The Chicago Park District will submit the QAP to the USEPA for approval at least 45 days before the scheduled start of field work. Field work at the DuSable park site under this project will not commence until the QAP is approved by the USEPA.

Health and Safety Plan

Field work at the DuSable Park site under this project will not commence until a final, site-specific Health and Safety Plan is in place. The preparation of the Health and Safety Plan will be a task of the Chicago Park District's environmental engineering contractor. The plan will provide for the protection of all on-site personnel and area residents. The site-specific Health and Safety Plan will comply with Occupational Safety and Health Administration (OSHA) 29 CFR 1910.120, entitled, "Hazardous Waste Operations and Emergency Response."

Community Relations Plan

Field work at the DuSable Park site under this project will not commence until a Community Relations Plan is approved by the USEPA Regional Community Relations Coordinator. The preparation of the Community Relations Plan will be a task of the Chicago Park District's environmental engineering contractor. The plan will comply with community relations requirements described in the USEPA policy and guidance, and in the National Contingency Plan.

Task 2 – Removal Activity

The Chicago Park District will contract with a qualified firm from its pre-qualified pool of environmental engineering companies to complete removal activities in accordance with the USEPA approved Work Plan, QAP, Community Relations Plan, and Health and Safety Plan. Removal activities will proceed until all thorium contaminated material is removed from the site or until the funding provided in this Cooperative Agreement is exhausted. If funding is exhausted, all removal activity will cease at that time and will not resume until a different funding source becomes available.

As will be provided for in the Work Plan, the USEPA will be made aware of all removal activity and will be provided an opportunity to oversee the work and collect split samples as needed.

Task 3 – Additional Radiological Screening

Should there be remaining funding following the completion of Task 2, The Chicago Park District will contract with a qualified firm from its pre-qualified pool of environmental engineering companies to complete additional radiological screening at the site in accordance with the USEPA approved Work Plan, QAP, Community Relations Plan, and Health and Safety Plan.

As will be provided for in the Work Plan, the USEPA will be made aware of all additional radiological screening activity and will be provided an opportunity to oversee the work and collect split samples as needed.

k. Schedule of Deliverables:

The Chicago Park District and its environmental engineering subcontractor will provide the USEPA with a schedule of deliverables prior to the start of field work. As work proceeds, the USEPA will be kept up to date as to the work progress and the schedule of deliverables will be updated accordingly.

l. Project milestones

The estimated schedule for project milestones is as follows:

Milestone	Date work will begin	Date of anticipated completion
Contracting with qualified environmental engineering firm	Immediately upon approval of Cooperative Agreement.	March 2011
Prepare and submit site-specific Work Plan for USEPA approval	Immediately upon contracting with environmental engineering contractor.	July 2011
Prepare and submit site-specific QAP for USEPA approval	Immediately upon contracting with environmental engineering contractor.	July 2011
Prepare and submit site-specific Community Relations Plan for USEPA approval	Immediately upon contracting with environmental engineering contractor.	July 2011
Prepare and submit site-specific Health and Safety Plan for USEPA approval	Immediately upon contracting with environmental engineering contractor.	July 2011
Complete removal of thorium contaminated materials from site	Upon USEPA approval of Work Plan, QAP, and Health and Safety Plan.	December 2011
Prepare and submit removal completion report to USEPA	Upon completion of removal activity under USEPA approved Work Plan.	Within 30 days of completing removal activity.
Complete additional radiological screening	Upon completion of removal action, provided that funding is available.	December 2012

Prepare and submit all investigation report documentation to the USEPA	Immediately upon the start of field work activity.	January 2012
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m. Project Budget Summary:

(*Please note that the complete project budget information is included in the attached SF 424 A Forms)

Category	Cooperative Agreement Request	Notes
Personnel/Salaries	\$0	CPD is electing not to include personnel charges
Fringe Benefits	\$0	
Travel	\$0	
Equipment	\$0	
Supplies	\$0	
Contractual – Task 1	\$45,000	For preparation of required work documents
Contractual – Task 2	\$180,000	For removal activity
Contractual – Task 3	\$49,287	For additional radiological screening
Total Direct Charges	\$269,287	
Indirect charges	\$0	Indirect charges are not allowed since the monies funding this Cooperative Agreement are from a Superfund special account.
Total	\$269,287	

n. The Itemized Object Class Category Budget Narrative

Personnel/Salaries

The budget does not include salary or indirect charges for Chicago Park District staff.

Contractual

The budget includes \$269,287 in contractual costs for preparation of a site-specific work plan, QAP, health and safety plan, and community relations plan. This also includes cost associated with and all thorium investigation, removal, and disposal.

o. Variances and Clarifications from 40 CFR Part 35 Subpart O

§ 6200, 6205, 6215, 6230, 6235, 6240 do not apply, as discussed on the November 15, 2010 telephone conference, the planned cooperative agreement is for removal, and there is no cost sharing involved.

§ 35.6270 (Standards for financial management systems), as discussed on the November 15, 2010 telephone conference, USEPA believes the Chicago Park District should already be certified for these standards.

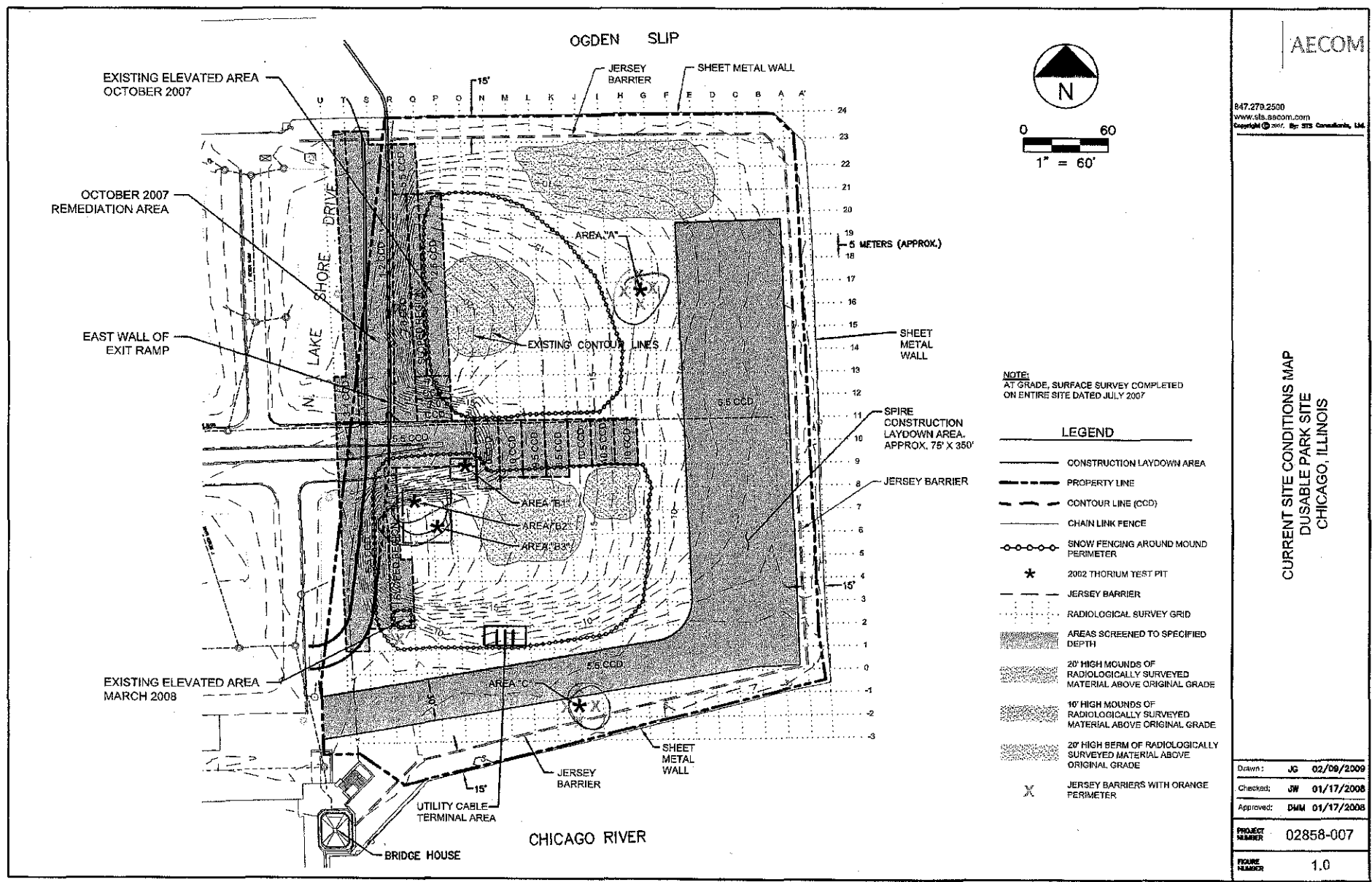
§ 35.6275 (Period of availability of funds), as discussed on the November 15, 2010 telephone conference, the Chicago Park District will not be required to expend money within a designated time frame and that if necessary USEPA will grant multiple extensions due to the extremely long persistence of thorium in the environment.

§ 35.6550 (Procurement system standards), as discussed on the November 15, 2010 telephone conference, USEPA noted that the Park District's procurement process of selecting an environmental engineering firm from its pre-qualified pool of subcontractors to negotiate a contract with is satisfactory as there was a competitive process to get on the pre-qualified pool list.

§ 35.6575 (Restrictions on types of contracts), subsection (c), as discussed on the November 15, 2010 telephone conference, USEPA noted that the Chicago Park District may utilize a time and materials contract as long as that contract includes a ceiling price that the contractor exceeds at its own risk.

§ 35.6595(b)(1) (Energy efficiency), at this time it is unknown if the Chicago Park District has a state-compliant system in place yet, although it is in process. In the interim, the Chicago Park District requests a waiver from this requirement as part of this Cooperative Agreement application, on the grounds that the standards for energy efficiency do not apply to the planned thorium-related work in any event.

§ 35.6750 (Modifications), as discussed on the November 15, 2010 telephone conference, modifications to this agreement may be necessary and may be completed with the approval of both the USEPA and the Chicago Park District.



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CURRENT SITE CONDITIONS MAP
DUSABLE PARK SITE
CHICAGO, ILLINOIS

Drawn:	JG	02/09/2009
Checked:	JW	01/17/2008
Approved:	DWM	01/17/2008
PROJECT NUMBER	02858-007	
FIGURE NUMBER	1.0	

EPA Project Control Number

CERTIFICATION REGARDING LOBBYING

CERTIFICATION FOR CONTRACTS, GRANTS, LOANS AND COOPERATIVE AGREEMENTS

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

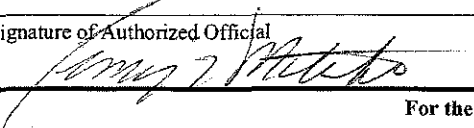
(3) The undersigned shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including sub-contracts, sub-grants, and contracts under grants, loans, and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31 U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Timothy J. Mitchell, General Superintendent and CEO

Typed Name & Title of Authorized Representative


Signature and Date of Authorized Representative

United States Environmental Protection Agency Washington, DC 20460		
Preaward Compliance Review Report for All Applicants and Recipients Requesting EPA Financial Assistance <i>Note: Read instructions on other side before completing form.</i>		
I. Applicant/Recipient (Name, Address, State, Zip Code). Chicago Park District, 541 N. Fairbanks Ct., Chicago, IL 60611	DUNS No. 066194358	
II. Is the applicant currently receiving EPA assistance? Yes.		
III. List all civil rights lawsuits and administrative complaints pending against the applicant/recipient that allege discrimination based on race, color, national origin, sex, age, or disability. (Do not include employment complaints not covered by 40 C.F.R. Parts 5 and 7. See instructions on reverse side.) Please see attached document.		
IV. List all civil rights lawsuits and administrative complaints decided against the applicant/recipient within the last year that allege discrimination based on race, color, national origin, sex, age, or disability and enclose a copy of all decisions. Please describe all corrective action taken. (Do not include employment complaints not covered by 40 C.F.R. Parts 5 and 7. See instructions on reverse side.) Please see attached document.		
V. List all civil rights compliance reviews of the applicant/recipient conducted by any agency within the last two years and enclose a copy of the review and any decisions, orders, or agreements based on the review. Please describe any corrective action taken. (40 C.F.R. § 7.80(c)(3)) Please see attached document.		
VI. Is the applicant requesting EPA assistance for new construction? If no, proceed to VII; if yes, answer (a) and/or (b) below. No. a. If the grant is for new construction, will all new facilities or alterations to existing facilities be designed and constructed to be readily accessible to and usable by persons with disabilities? If yes, proceed to VII; if no, proceed to VI(b). b. If the grant is for new construction and the new facilities or alterations to existing facilities will not be readily accessible to and usable by persons with disabilities, explain how a regulatory exception (40 C.F.R. § 7.70) applies.		
VII.* Does the applicant/recipient provide initial and continuing notice that it does not discriminate on the basis of race, color, national origin, sex, age, or disability in its programs or activities? (40 C.F.R. § 5.140 and § 7.95) Yes. a. Do the methods of notice accommodate those with impaired vision or hearing? Yes. b. Is the notice posted in a prominent place in the applicant's offices or facilities or, for education programs and activities, in appropriate periodicals and other written communications? Yes. c. Does the notice identify a designated civil rights coordinator? Yes.		
VIII.* Does the applicant/recipient maintain demographic data on the race, color, national origin, sex, age, or handicap of the population it serves? (40 C.F.R. § 7.85(a)) Yes.		
IX.* Does the applicant/recipient have a policy/procedure for providing access to services for persons with limited English proficiency? (40 C.F.R. Part 7, E.O. 13166) Yes.		
X.* If the applicant/recipient is an education program or activity, or has 15 or more employees, has it designated an employee to coordinate its compliance with 40 C.F.R. Parts 5 and 7? Provide the name, title, position, mailing address, e-mail address, fax number, and telephone number of the designated coordinator. Yes. Please see attached document.		
XI.* If the applicant/recipient is an education program or activity, or has 15 or more employees, has it adopted grievance procedures that assure the prompt and fair resolution of complaints that allege a violation of 40 C.F.R. Parts 5 and 7? Provide a legal citation or Internet address for, or a copy of, the procedures. Yes. Please see attached document.		
For the Applicant/Recipient		
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. I assure that I will fully comply with all applicable civil rights statutes and EPA regulations.		
A. Signature of Authorized Official 	B. Title of Authorized Official General Superintendent and CEO	C. Date 2/1/2011
For the U.S. Environmental Protection Agency		
I have reviewed the information provided by the applicant/recipient and hereby certify that the applicant/recipient has submitted all preaward compliance information required by 40 C.F.R. Parts 5 and 7; that based on the information submitted, this application satisfies the preaward provisions of 40 C.F.R. Parts 5 and 7; and that the applicant has given assurance that it will fully comply with all applicable civil rights statutes and EPA regulations.		
A. Signature of Authorized EPA Official See ** note on reverse side.	B. Title of Authorized EPA Official	C. Date

III. List all civil rights lawsuits and administrative complaints pending against the applicant/recipient that alleged discrimination based on race, color, national origin, sex, age, or disability. (Do not include employment complaints not covered by 40 C.F. R. Parts 5 and 7. See instructions on reverse side.)

Chicago Commission on Human Relations

1. Love v. Chicago Park District, Case No. 05 E 142, Filed 12/20/05.
2. Blakemore v. Chicago Park District, Case No. 09-P-81, Chicago Commission on Human Relations. Filed 12/16/09. (Plaintiff alleges failure to provide a public accommodation on the basis of his race.)
3. Matthew Jancik v. Chicago Park District, Case No. 10-P-004, Chicago Commission on Human Relations. Filed 02/11/10. (Plaintiff alleges failure to provide a public accommodation on the basis of his disability.)
4. Jasmine Watson v. Chicago Park District, Case No. 10-P-31, Chicago Commission on Human Relations. Filed 05/25/10. (Plaintiff alleges failure to provide a public accommodation on the basis of her race and parental status.)

Illinois Department of Human Rights

1. Henry v. Chicago Park District, Case No. 2010 CD 1763, IDHR. Filed 12/22/09.
2. McGrath v. Chicago Park District, Case No. 2010 CF 2427, IDHR. Filed 03/08/09.
3. Burks Curry v. Chicago Park District, Case No. 2010 CF 2604, IDHR. Filed 03/03/10.
4. Yost v. Chicago Park District, Case No. 2010CF3543, IDHR. Filed 05/13/10.
5. Ballard v. Chicago Park District, Case No. 2009-CA-0348, IDHR. Filed 09/2008.
6. Johnson v. Chicago Park District, Case No. 2009CF0344, IDHR. Filed 08/19/08.
7. Jedynak v. Chicago Park District, Case No. 2010CN0444, IDHR. Filed 08/13/09.
8. Portis v. Chicago Park District, Case No. 2010CA3119, IDHR. Filed 04/2010.
9. Love v. Chicago Park District, Illinois Human Rights Commission, IDHR No. 2006 CA 1732. Filed 12/13/06.
10. McGrath v. Chicago Park District, Case No. 2011 CF 0225, IDHR. Filed 7/26/10.
11. Morano v. Chicago Park District, Case No. 2010CA3893, IDHR. Filed 6/3/10.

Circuit Court of Cook County, Law Division

1. Locke v. Chicago Park District, Case No. 2010 L 000233, Circuit Court of Cook County, Law Division. Filed 01/08/10. (Plaintiff alleges employment discrimination on the basis of his race.)

Equal Employment Opportunity Commission

1. Lowe v. Chicago Park District, Case No. 848-2008-04059, EEOC. Filed 11/28/07.
2. Toft v. Chicago Park District, Case No. 440-2008-5114, EEOC. Filed 04/24/08.
3. Locke v. Chicago Park District, Case No. 440-2010-01639, EEOC. Filed 01/08/10.

4. Johnson v. Chicago Park District, Case No. 21BA82756, EEOC. Filed 08/19/08.
5. Monroe v. Chicago Park District, Case No. 440-2010-06115, EEOC. Filed 9/3/10.
6. Baker v. Chicago Park District, Case No. 440-2011-01153, EEOC. Filed 12/10/10.

United States District Court for the Northern District of Illinois

1. Thompson v. Chicago Park District, Case No. 09-06057, U.S. Dist. Ct. Filed 11/06/09.
2. Allen et al. v. Chicago Park District, Case No. 09-8075, U.S. Dist. Ct. Filed 12/31/09.

United States Court of Appeals for the Seventh Circuit

1. Schandelmeier-Bartels v. Chicago park District, Case No. 09-3286, United States Court of Appeals for the Seventh Circuit.

IV. List all civil rights lawsuits and administrative complaints decided against the applicant/recipient within the last year that allege discrimination based on race, color, national origin, sex age, or disability and enclose a copy of all decisions. Please describe all corrective action taken. (Do not include employment complaints not covered by 40 C.F.R. Parts 5 and 7. See instructions on reverse side.)

1. No complaints or lawsuits decided against the Chicago Park District (06/17/09 through 06/17/10).

V. List all civil rights compliance reviews of the applicant/recipient conducted by any agency within the last two years and enclose a copy of the review and any decisions, orders or agreements based on the review. Please describe any corrective action taken. (40 C.F.R. Section 7.80(c)(3).

1. None.

VI. If the applicant/recipient is an education program/activity, or has 15 or more employees, has it designated an employee to coordinate its compliance with 40 C.F.R. Parts 5 and 7? Provide the name, title, position, mailing address, e-mail address, fax number and telephone number of the designated coordinator.

Larry Labiak
Disability Policy Officer
Chicago Park District
541 N. Fairbanks
Chicago, IL 60611
Phone: (312) 742-5097
Email: larry.labiak@ChicagoParkDistrict.com
Fax: (312) 742-5329

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

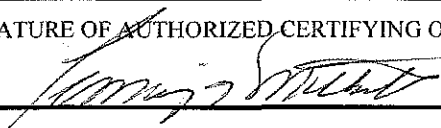
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

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| <ol style="list-style-type: none"> 1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application. 2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives. 3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain. 4. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain. 5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. 4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F). 6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. 1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), which prohibits discrimination on the | <ol style="list-style-type: none"> basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. 6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VII of the Civil Rights Act of 1968 (42 U.S.C. 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application. 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases. 8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds. |
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<p>9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. 276a to 276a-7), the Copeland Act (40 U.S.C. 276c and 18 U.S.C. 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. 327-333), regarding labor standards for federally-assisted construction subagreement.</p> <p>10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.</p> <p>11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in flood plains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. 7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).</p>	<p>12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. 1271 et seq.) Related to protecting components or potential components of the national wild and scenic rivers system.</p> <p>13. Will assist the awarding agency in assuring compliance will Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. 469a-1 et seq.).</p> <p>14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.</p> <p>15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. 2131 et seq.) Pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.</p> <p>16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.) Which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.</p> <p>17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."</p> <p>18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.</p>
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE General Superintendent & CEO
APPLICANT ORGANIZATION Chicago Park District	DATE SUBMITTED 2/18/2011